

Exhibit B

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS,
CORPUS CHRISTI DIVISION

JOSHUA HANCOCK and ARELI	§	
RAMOS, INDIVIDUALLY and as next	§	
friends, for K.H., S.H., and H.H.,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	C.A. No. 2:17-cv-00327
	§	
CORPUS CHRISTI INDEPENDENT	§	
SCHOOL DISTRICT and OFFICER	§	
ANDREW CARRIZALES,	§	
INDIVIDUALLY	§	
	§	
Defendants.	§	

DECLARATION OF BARBARA BRINKMAN

I, Barbara Brinkman, declare that I have personal knowledge of the facts contained in this Declaration, and that such statements are true and correct. If called and sworn as a witness, I would testify competently to those facts. I make this Declaration entirely of my own free will and choice. I have not been promised any benefit, nor have I been threatened with any detriment in connection with giving this declaration.

1. I currently serve as the Assistant Principal at Cunningham Middle School at South Park (CMS) within the Corpus Christi Independent School District (the "District"), a position I have held since December 2007. Before that, I served as a part-time assistant principal and a teacher at CMS. I hold a Doctor of Education (Ed.D.) in Educational Leadership, a Master's in Educational Administration and Special Education, a Bachelor's in psychology, and an Associate's degree in Liberal Arts. I have served in the field of education since 1996.

2. On November 9, 2016, H.H. and her sisters, K.H. and S.H., were served Criminal Trespass Warnings (CTWs) stating that they had to be off the CMS campus by 4:10 p.m. each day. Despite this, the three girls would remain on campus after 4:10 p.m.—in violation of the CTWs—on an almost daily basis. I notified Officer A. Carrizales on numerous occasions that I had seen the three girls on campus so that he could respond accordingly. They were given verbal warnings by Officer A. Carrizales each time they violated the CTW. They were also given verbal reminders to remain off campus after 4:10 p.m. by both Assistant Principals (Daniel Noyola, Jr. and myself) and Sandy Salinas-DeLeon, the Principal of CMS. One day during the week of November 28-December 2, 2016, I saw the three girls on campus after 4:10 p.m. and warned them that they needed to leave campus or they run the risk of being arrested, to which H.H. responded, "that officer ain't going to arrest anybody."

3. On Monday, December 5, 2016 at approximately 4:30 p.m., I was notified by Officer Carrizales on the radio that H.H. was in the CMS courtyard. Officer Carrizales, Principal Salinas-DeLeon, and I walked to the courtyard and saw H.H. walking around. Officer Carrizales approached H.H. and asked why she was on campus, and H.H. responded that she wanted a drink a water. Officer Carrizales then requested that she accompany him to his office, and she did so willingly. Mrs. Salinas-DeLeon and I joined Officer Carrizales and H.H. in the security office. While walking to the security office (or shortly after we arrived at the office), Officer Carrizales reported to Principal Salinas-DeLeon and me that he had also seen the other two sisters, K.H. and S.H., on campus in the front of the school after 4:10 p.m.

4. Once in the security office, Officer Carrizales placed H.H. in handcuffs and sat her in a chair. Shortly thereafter, Officer A. Shelly arrived as a transport officer. With H.H. secured in handcuffs, Officers Shelly and Carrizales walked to the front of the campus and escorted K.H. and S.H. into the security office. K.H. saw her sister H.H. in handcuffs and became demonstrably upset. She tried to leave the security office but was blocked by Officer Carrizales. Officer Carrizales began to place K.H. in handcuffs, and while doing so, K.H. struggled and became more agitated. Carrizales repeatedly told her to calm down and to stop resisting. K.H. pulled one of her arms out of Officer Carrizales' grip and turned around to face him, but Officer Carrizales turned her around again so that she would be facing away from him as she continued to struggle to get free.

5. Officer Carrizales had to lower K.H. to the floor as she struggled and she hit her head on the corner of a desk while resisting his efforts to place her in handcuffs. As this was happening, Officer Shelly was placing S.H. in handcuffs. S.H. was upset and yelling at Officer Carrizales to get his hands off K.H.

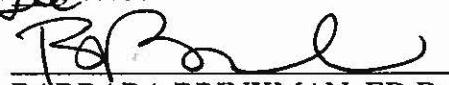
6. Approximately 15 minutes after all three sisters were in handcuffs, they were able to calm down and even began chatting and laughing together as if nothing was wrong.

7. K.H. was asked numerous times by Officer Carrizales and myself if she wanted an ice pack for her head, but she declined and—while laughing—stated that she had a “hard head”. She then walked over to Officer Carrizales, then myself, so that we could each feel the bump on her head. After feeling the bump, I again offered her an ice pack, but she declined.

8. After the paperwork was completed at approximately 5:50 p.m., Officer Shelly and I escorted the three girls to the police car and helped place them in the back seat. Officer Shelly transported the three girls to the Nueces County Juvenile Justice Center (JJC). The three sisters remained handcuffed until their arrival at JJC.

9. During the time I spent with the girls in the security office and until their departure with Officer Shelly to JJC, I never witness H.H., K.H., or S.H. complain of physical pain or give the appearance of being hurt or in pain.

I DECLARE UPON PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. EXECUTED ON SEPTEMBER 26 2019.



BARBARA BRINKMAN, ED.D.